

201-15582

G E O
SPECIALTY CHEMICALS

201-NCIC

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

10/16/2001

01 SEP 10 10:1:28

Mr. Charles Auer
United States Environmental Protection Agency
401 M Street, SW; Mail Code: 7405
Washington, DC 20460

Re: No longer HPV Chemical - Dimethyl Benzyl Alcohol (CAS No. 617-94-7)

Dear Mr. Auer:

In June 2001 GEO Specialty Chemicals, Inc. purchased the organic peroxides business from Hercules, Inc., Wilmington, DE. Several materials involved in the purchase are HPV chemicals. Hercules had previously made the commitment to EPA to sponsor several listed chemicals, including Dimethyl Benzyl Alcohol (CAS No. 617-94-7) (DMBA). Subsequently, Hercules wrote a letter to EPA on November 6, 2000 (attached) requesting that DMBA be removed from the HPV list based on an annual volume of 190,000 lbs. and that Hercules believed it was the only manufacturer of DMBA.

GEO Specialty Chemicals is following up on the status of that request. Please take the appropriate action to remove DMBA from the HPV List. If there are other manufacturers or importers of DMBA, please provide us that information so that we may attempt to form a consortium to share the cost of the testing.

Thank you for your consideration. Please call me if you have additional questions or comments.

Sincerely,

Lester M. Bynum
Manager, Regulatory Affairs
(973) 484-8400, x242
lester.bynum@geosc.com

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Hercules Incorporated
Hercules Plaza
1313 North Market Street
Wilmington, DE 19894-0001
(302) 594-5000

November 6, 2000

Ms. Carol M. Browner, Administrator
U.S. Environmental Protection Agency
P.O. Box 1473
Merrifield, VA 22116

Attention: **Chemical Right-to-Know Program**

RE: **No Longer HPV Chemicals**

Dear Ms. Browner,

With respect to EPA guidance document on this subject, we are requesting advice concerning two chemicals which Hercules Incorporated manufactures or imports. Both chemicals are currently on EPA's HPV list. Hercules agreed to sponsor one of those chemicals (see memo attached). The specific chemicals in question are listed in Attachment A. You will find in EPA records that while Hercules reported both chemicals on 1994 and 1998 IUR reports, the production quantities were well below that which would define these substances as HPV chemicals. Our production has been relatively stable over a long period of time with no foreseeable intent to increase production for those chemicals.

To date, Hercules has not identified any other US manufacturers or importers of these chemicals, and we are not aware of any HPV consortium sponsoring these chemicals. As such, we believe we are the only manufacturer/importer of these substances in the US. We are requesting EPA's acknowledgement as to whether there are additional data to which Hercules does not have access which demonstrate that these chemicals are manufacturer/imported to the US in quantities >1,000,000 lbs./yr., and qualify as HPV chemicals. If not, Hercules respectfully requests EPA to remove these chemicals from the HPV list.

In the event EPA has data demonstrating that there are other manufacturers/importers that generate sufficient volume to qualify these substances as HPV chemicals, Hercules respectfully wishes to withdraw sole sponsorship until such time as other parties willing to share in this commitment may come forward.

Thank you in advance for your review and consideration of this request.

Respectfully,

Mr. G. L. McCallister
Corporate Manager, Hazard Communication

GLM:clj
Attachment
2000j-d.doc/17

Attachment A

Proposed Chemicals to designate as No Longer HPV Chemicals

CASRN	Chemical name	94 IUR (lbs.)	98 IUR (lbs.)	status
617-94-7	Dimethyl benzyl alcohol	190,000	190,000	Currently on HPV list. Sponsored by Hercules via 11/24/99 memo to EPA.
13393-93-6	Abietyl alcohol	110,000	160,000	Currently on HPV list. No sponsor to date.

GLM:clj
2000j-d.doc/18

Reference: G. L. McCallister to Carol Browner, EPA - Chemical Right-to-Know Program/No Longer HPV Chemicals,
11/6/00 letter.